

## **REMARKS/ARGUMENTS**

Reconsideration of the application is requested.

Claims 1-10 remain in the application. Claims 1, 4, 6, and 9 have been amended.

More specifically, claim 1 has been amended in light of the Examiner's objections and in an effort to more clearly distinguish the invention over the art. The "at least two parts" of the transverse webs have been clarified and their relative displacement and positioning is now more clearly explained in structural and functional terms. In this regard, the Examiner's rejection under 35 U.S.C. § 112, first paragraph, is not well taken. One should not confuse the fact that a claim may be broad with it being indefinite. While the transverse webs of claim 1, and indeed the structural relationships of claim 1, may be broadly recited, there is nothing indefinite about these features. The structure illustrated in the figures is but an exemplary implementation of the invention, i.e., a best mode example. The concept of the invention may be implemented in various structures within the boundaries of the claims. The Examiner is requested not to read any limitations that may be found in the specification into the claims, yet afford the claims their reasonably broad meaning within the language-defined metes and bounds.

Applicants illustrate the transverse webs in two parts. This embodiment appears to be the most economic and efficient within the boundaries of the inventive concept. One could probably find a multitude of alternatives – including transverse webs with more than two parts – that would still fall within the literal meaning of the claims, yet

that would not deviate inventively from the novel concept proposed by applicants and that would not cause unreasonable experimentation.

The rejection of claims 4, 5, and 7-10 is well taken. The "two parts" of the transverse webs are now properly defined. Similarly, the rejections of claims 6, 7, and 9 in the last three paragraphs on page 3 of the Office action are well taken. Appropriate amendments have been made.

The specification and the claims meet the requirements of 35 U.S.C. § 112, first and second paragraphs. Should the Examiner find any further objectionable items, counsel would appreciate a telephone call during which the matter may be resolved.

We now turn to the art rejections, in which claims 1-5 have been rejected as being anticipated by Robinson (US 3,194,729), claims 1-3 have been rejected as being anticipated by Corbellini (US 4,957,598), claims 1-3 and 6 have been rejected as being anticipated by McPherson (US 5,630,910), and claims 1-7 have been rejected as being anticipated by Simmons et al. (US 5,076,894) under 35 U.S.C. § 102(b).

Before delving into the specifics, we reiterate the requirements of a proper rejection under 35 U.S.C. § 102: Anticipation is established only when a single prior art reference discloses, expressly or under the principles of inherency, each and every element of a claimed invention as well as disclosing structure which is capable of performing the recited functional limitations. RCA Corp. v. Applied Digital Data Sys., Inc., 730 F.2d 1440, 221 USPQ 385 (Fed. Cir. 1984). W.L. Gore and Assoc., Inc. v. Garlock, Inc., 721 F.2d 1540, 1554, 220 USPQ 303 (Fed. Cir. 1983). In other words,

a claim is anticipated if a single reference, either expressly or inherently, discloses every limitation of the claim at issue. In re Schreiber, 128 F.3d 1473 (Fed. Cir. 1997).

In this case, it appears the Examiner did not afford the structural language according to which the parts of the transverse webs are “displaceably disposed” and the functional limitation “for clamping said supporting and wiping strips” any patentable weight. As this feature lies at the heart of the invention, we have further emphasized the same. The transverse webs facilitate the connection between the carrier and the wiping strips and they clamp the wiping strips upon having their parts move relative to one another.

None of the allegedly anticipatory references show the claimed invention, nor do they render the same obvious. Robinson does not have transverse webs with two or more parts which, when moved relative to one another, clamp another structure. Similarly, Corbellini does not have transverse webs with two or more parts which, when moved relative to one another, clamp the support bars and/or the wiping blades. Simmons has transverse webs (“cross braces 34”) formed with undercuts (“mounting slots 32”) into which dovetail projections 30 of the wiping strip supports (24) are slid. The transverse webs do not have multiple parts that can be moved relative to one another and which, upon being displaced, clamp the supports and wiping strips.

The same is true with regard to McPherson. There, the slots in the members 28 are fixed slots that are keyed for insertion of the wiping strips. The “fasteners 2” which are formed with the slots are fixed to a transverse support member 3. While it would

appear possible for the "fasteners 2" to be displaceable relative to the support member 3, such displacement would not result in a clamping of the support or wiping strips. McPherson does not disclose any structure which would be capable of performing the recited functional limitations of claim 1.

The indicated allowability of claims 8-10 is appreciatively noted. These claims have not been rewritten in independent form yet because it is believed that claim 1, as amended, is patentable over the art of record.

In summary, none of the references, whether taken alone or in any combination, either show or suggest the features of claim 1. Claim 1 is, therefore, patentable over the art and since all of the dependent claims are ultimately dependent on claim 1, they are patentable as well.

In view of the foregoing, reconsideration and allowance of claims 1-10 are solicited.

Respectfully submitted,

/Werner H. Stemer/

Werner H. Stemer  
Reg. No. 34,956

August 28, 2006

Lerner Greenberg Stemer LLP  
P.O. Box 2480  
Hollywood, Florida 33022-2480  
Tel.: 954-925-1100  
Fax: 954-925-1101